

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
AT CHARLOTTESVILLE

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

MAR 15 2006

JOHN F. CORCORAN, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA,

: INDICTMENT

v.

:

:

:

:

Criminal No. 3:06-cr-00011

:

In violation of:

JONATHAN LEONARD DEAN.

:

:

Title 18, United States Code

:

Sections 2252A(a)(5)(B);

:

2252A(b)(2); and 2253; and

:

:

Title 26, United States Code

:

Sections 5845(a); 5845(f); and

:

5861(d).

Count One

(Possession of a Destructive Device)

The Grand Jury charges:

That on or about November 5 and 6, 2005, in the Western Judicial District of Virginia, the defendant, JONATHAN LEONARD DEAN, did knowingly possess a destructive device, to wit: one improvised explosive weapon, also known as an explosive bomb, which destructive device was not registered to him in the National Firearms Registration and Transfer Record as required by law.

All in violation of Title 26, United States Code, Sections 5845(a); 5845(f); and 5861(d).

Count Two

(Possession of a Destructive Device)

The Grand Jury charges:

That on or about November 5 and 6, 2005, in the Western Judicial District of Virginia, the defendant, JONATHAN LEONARD DEAN, did knowingly possess a destructive device, to wit: one incendiary bomb, which destructive device was not registered to him in the National Firearms Registration and Transfer Record as required by law.

All in violation of Title 26, United States Code, Sections 5845(a); 5845(f); and 5861(d).

Count Three

(Possession of Child Pornography)

The Grand Jury charges:

That on or about November 5 and 6, 2005, in the Western Judicial District of Virginia, the defendant, JONATHAN LEONARD DEAN, did knowingly possess, or attempt to possess, material containing multiple images of child pornography as defined in Title 18, United States Code, Section 2256(8)(A), including, but not limited to, digital image files entitled: preteen_boy_crying_as_he_is_raped.jpg.jpg; Lolita_Fk01_06x(2).jpg; and Lolita_Fk01_03x(1).jpg; and multiple video files including, but not limited to, files entitled: (Hussyfan)(Pthc)(Webcam) Blonde&BF - (Girl 13yo & Boyfriend).mpg; (Pthc) Videochat - Webcam - 10 Year Young Girl.avi; Fucked With Violence - Rape Xxx Porn.avi; and pthc

sally - my daughter at 5 fucking little girl hardcore.mpg, that had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer, or that was produced using materials that had been mailed, or shipped or transported in interstate or foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

Count Four

(Forfeiture)

Upon conviction for violating Title 18, United States Code, Section 2252A, defendant, JONATHAN LEONARD DEAN, shall forfeit to the United States any and all matter that contains visual depictions, produced, transported, shipped, or received, in violation thereof; any property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation(s); and any and all property used or intended to be used in any manner or part to commit and to promote the commission of the aforementioned violation(s), including but not limited to the following:

1. All such material containing the above-described visual depictions;

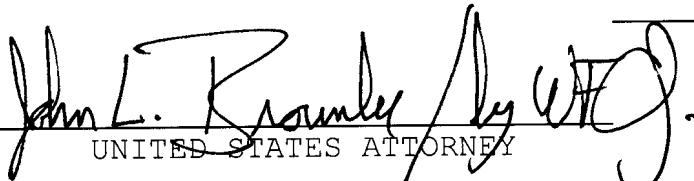
2. Any computer that was used by JONATHAN LEONARD DEAN to commit and to promote the commission of the aforementioned violation(s), including, but not limited to, the computer seized from him on or about November 6, 2005.

3. Any software, computer storage devices, or other materials used to commit and to promote the commission of the aforementioned violation(s).

If any of the property described above is not available for forfeiture as a result of any act or omission of the defendant, the United States intends to seek substitute assets pursuant to the provisions of Title 18, United States Code, Section 2253(o).

In violation of Title 18, United States Code, Section 2253.

A TRUE BILL, this 15th day of March, 2006.


UNITED STATES ATTORNEY


FOREMAN